

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA : CRIMINAL NO. 04-146**

<b>v.</b>	:	<b>DATE FILED:</b>
	:	
<b>SHAWN GEATHERS,</b>	:	<b>VIOLATIONS: 18 U.S.C. § 1344</b>
<b>a/k/a “Malik Bey”</b>	:	<b>(Bank fraud – 7 counts)</b>
<b>JAMES ROBINSON,</b>	:	<b>Notice of additional factors</b>
<b>a/k/a “Aaron White”</b>	:	<b>Notice of forfeiture</b>
<b>YARNELL FOWLER</b>	:	
<b>RANDOLPH WASHINGTON</b>	:	
<b>EBONY KELSEY</b>	:	
<b>NORA SALTERS</b>	:	
<b>PAUL WHITESIDE,</b>	:	
<b>a/k/a “Puma”</b>	:	
<b>JARRETT STIFF,</b>	:	
<b>a/k/a “Chicago”</b>	:	
<b>JAMAL GRIFFIN</b>	:	
<b>SHARNITA JACKSON</b>	:	
<b>MICHAEL A. DAUGHERTY, JR.</b>	:	

**SUPERSEDING INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. At all times material to this indictment, the Police and Fire Federal Credit Union was a financial institution, the deposits of which were federally insured by the National Credit Union Administration.

2. In or about December 2002, in the Eastern District of Pennsylvania and elsewhere, defendants

**SHAWN GEATHERS, a/k/a “Malik Bey,”**  
**JAMES ROBINSON, a/k/a “Aaron White,”**  
**RANDOLPH WASHINGTON, and**  
**NORA SALTERS**

knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to defraud the Police and Fire Federal Credit Union, and to obtain money owned by and under the custody and control of the Police and Fire Federal Credit Union, by means of false and fraudulent pretenses, representations, and promises.

### **THE SCHEME**

It was part of the scheme that:

3. Defendant SHAWN GEATHERS, a/k/a “Malik Bey,” manufactured counterfeit checks on his computer. Defendant GEATHERS manufactured these checks without the approval of the checking account holders.

4. Defendant JAMES ROBINSON, a/k/a “Aaron White,” recruited people to cash the counterfeit checks for money (“passers”). Defendant ROBINSON provided the names of these passers to defendant SHAWN GEATHERS.

5. Defendant SHAWN GEATHERS made the counterfeit checks payable to the passers.

6. Defendant JAMES ROBINSON distributed the counterfeit checks to the passers in accordance with an agreement and understanding that the passers would cash or attempt to cash the counterfeit checks at banks and check cashing businesses throughout the Eastern District of Pennsylvania and elsewhere.

7. When the passers successfully cashed the counterfeit checks, they returned the cash to defendant JAMES ROBINSON, who paid defendant SHAWN GEATHERS and gave some money back to the passers.

8. Defendants JAMES ROBINSON, RANDOLPH WASHINGTON, and

NORA SALTERS all acted as passers. As passers, they cashed and attempted to cash the counterfeit checks at the Police and Fire Federal Credit Union.

9. The following counterfeit checks were cashed or attempted to be cashed by passers at the Police and Fire Federal Credit Union:

Payer information on counterfeit checks	Check numbers	Approximate dates	Total amount of counterfeit checks
Lutheran Children & Family Service of Eastern Pennsylvania	36728 36729 36730 36741 36726 36727 36746 36747	12-13-02 12-13-02 12-13-02 12-13-02 12-14-02 12-14-02 12-14-02 12-14-02	\$11,484.46
Eastern Medical Associates, Ltd.	4070 4071 4072 4073 4074	12-28-02 12-28-02 12-28-02 12-28-02 12-28-02	\$7,132.60
Eastern Medical Supply Services Inc.	9691 9692 9693 9694 9702 9703 9704	12-30-02 12-30-02 12-30-02 12-30-02 12-30-02 12-30-02 12-30-02	\$9,985.64

All in violation of Title 18, United States Code, Sections 1344 and 2.

## **COUNT TWO**

### **THE GRAND JURY FURTHER CHARGES THAT:**

1. At all times material to this indictment, Citizens Bank and the former Mellon Bank (collectively, “Citizens Bank”) were financial institutions, the deposits of which were federally insured by the Federal Deposit Insurance Corporation.

2. From in or about June 2002, through in or about June 2003, in the Eastern District of Pennsylvania and elsewhere, defendants

**SHAWN GEATHERS, a/k/a “Malik Bey,”  
JAMES ROBINSON, a/k/a “Aaron White,”  
EBONY KELSEY, and  
JAMAL GRIFFIN,**

and others known and unknown to the grand jury, knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to defraud Citizens Bank, and to obtain money owned by and under the custody and control of Citizens Bank, by means of false and fraudulent pretenses, representations, and promises.

### **THE SCHEME**

It was part of the scheme that:

3. Paragraphs 3 through 7 of Count One are realleged here.

4. Defendants JAMES ROBINSON, a/k/a “Aaron White,” EBONY KELSEY, JAMAL GRIFFIN and others known and unknown to the grand jury all acted as passers. As passers, they cashed and attempted to cash the counterfeit checks at Citizens Bank.

5. The following counterfeit checks were cashed or attempted to be cashed by passers at Citizens Bank:

Payer information on counterfeit checks	Check numbers	Approximate dates	Total amount of counterfeit checks
TWI Cable Inc.	381025 381036 381032 381035	06-04-02 06-05-02 06-06-02 06-06-02	\$3,283.40
Gracelawn Sales, Inc.	9339 9340 9341 9345 9346 9347 9349 9350 9351 9352 9353 9364 9368 9374 9382	09-18-02 09-18-02 09-18-02 09-18-02 09-18-02 09-18-02 09-18-02 09-18-02 09-18-02 09-18-02 09-18-02 09-19-02 09-19-02 09-19-02 09-19-02	\$12,922.50
Trouvaille Federal Credit Union	90733 90731	03-10-03 03-11-03	\$1,697.00
Steaks, Inc.	9674 9675 9676 9678	06-24-03 06-24-03 06-24-03 06-24-03	\$1,994.00

All in violation of Title 18, United States Code, Sections 1344 and 2.

### **COUNT THREE**

#### **THE GRAND JURY FURTHER CHARGES THAT:**

1. At all times material to this indictment, PNC Bank was a financial institution, the deposits of which were federally insured by the Federal Deposit Insurance Corporation.

2. From in or about September 2002, through in or about July 2003, in the Eastern District of Pennsylvania and elsewhere, defendants

**SHAWN GEATHERS, a/k/a “Malik Bey,”  
JAMES ROBINSON, a/k/a “Aaron White,”  
YARNELL FOWLER,  
EBONY KELSEY,  
JARRETT STIFF, a/k/a “Chicago,” and  
SHARNITA JACKSON,**

and others known and unknown to the grand jury, knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to defraud PNC Bank, and to obtain money owned by and under the custody and control of PNC Bank, by means of false and fraudulent pretenses, representations, and promises.

#### **THE SCHEME**

It was part of the scheme that:

3. Paragraphs 3 through 7 of Count One are realleged here.

4. Defendants YARNELL FOWLER, EBONY KELSEY, JARRETT STIFF, SHARNITA JACKSON, and others known and unknown to the grand jury acted as passers. As passers, they cashed and attempted to cash the counterfeit checks at PNC Bank.

5. The following counterfeit checks were cashed or attempted to be cashed by passers at PNC Bank:

Payer information on counterfeit checks	Check numbers	Approximate dates	Total amount of counterfeit checks
Pinnacle Energy, Inc.	4777 4778 4783 4787 4803 4804 4806 4808 4816	09-14-02 09-14-02 09-14-02 09-14-02 09-14-02 09-14-02 09-14-02 09-14-02 09-15-02	\$7,151.51
Lutheran Children & Family Service of Eastern Pennsylvania	32285 32286 32288 32289 32290 32291 32292 32287 32294 32295	11-01-02 11-01-02 11-01-02 11-01-02 11-01-02 11-01-02 11-01-02 11-04-02 11-04-02 11-04-02	\$6,688.62
Wood Dining Services	801847 801851 801852 801853 801854 801859 801860 801861	03-06-03 03-06-03 03-06-03 03-06-03 03-06-03 03-07-03 03-07-03 03-07-03	\$6,711.77
Baxter & Kourlesis	1031 1032	07-28-03 07-28-03	\$1,788.68

All in violation of Title 18, United States Code, Sections 1344 and 2.

## **COUNT FOUR**

### **THE GRAND JURY FURTHER CHARGES THAT:**

1. At all times material to this indictment, Commerce Bank was a financial institution, the deposits of which were federally insured by the Federal Deposit Insurance Corporation.

2. From in or about November 2002, through in or about November 2003, in the Eastern District of Pennsylvania and elsewhere, defendants

**SHAWN GEATHERS, a/k/a “Malik Bey,”  
JAMES ROBINSON, a/k/a “Aaron White,”  
YARNELL FOWLER,  
RANDOLPH WASHINGTON,  
EBONY KELSEY,  
PAUL WHITESIDE, a/k/a “Puma,”  
JARRETT STIFF, a/k/a “Chicago,”  
JAMAL GRIFFIN, and  
SHARNITA JACKSON**

and others known and unknown to the grand jury, knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to defraud Commerce Bank, and to obtain money owned by and under the custody and control of Commerce Bank, by means of false and fraudulent pretenses, representations, and promises.

### **THE SCHEME**

It was part of the scheme that:

3. Paragraphs 3 through 7 of Count One are realleged here.

4. Defendants SHAWN GEATHERS, a/k/a “Malik Bey,” JAMES ROBINSON, a/k/a “Aaron White,” YARNELL FOWLER, RANDOLPH WASHINGTON, EBONY KELSEY, PAUL WHITESIDE, a/k/a “Puma,” JARRETT STIFF, a/k/a “Chicago,”



JAMAL GRIFFIN, SHARNITA JACKSON, and others known and unknown to the grand jury all acted as passers. As passers, they cashed and attempted to cash the counterfeit checks at Commerce Bank.

5. The following counterfeit checks were cashed or attempted to be cashed by passers at Commerce Bank:

Payer information on counterfeit checks	Check numbers	Approximate dates	Total amount of counterfeit checks
U.S. Vision	612299 612303	11-18-02 11-18-02	\$1,679.70
Lutheran Children & Family Service of Eastern Pennsylvania	36731 36732 36734 36735 36742 36743	12-12-02 12-12-02 12-12-02 12-12-02 12-14-02 12-14-02	\$7,692.84
Anne E. Fulmer Trust	5081 5089 5087	12-18-02 12-18-02 12-19-02	\$4,356.27
Eastern Medical Supply Services Inc.	9693 9694 9690 9696 9697 9698 9705 9710 9711 9712 9713 9714 9715 9716 9717 9725 9706 9707	12-29-02 12-29-02 12-30-02 12-30-02 12-30-02 12-30-02 12-30-02 12-30-02 12-30-02 12-30-02 12-30-02 12-30-02 12-30-02 12-30-02 12-30-02 12-30-02 12-31-02 12-31-02	\$28,668.42

Friends Life Care At Home	21143	01-06-03	\$9,417.46
	21147	01-06-03	
	21148	01-06-03	
	21151	01-06-03	
	21152	01-06-03	
	21153	01-06-03	
	21155	01-06-03	
	21169	01-06-03	
	21162	01-07-03	
	21180	01-07-03	
Metro Elevator Company, Inc.	9099	05-17-03	\$2,968.95
	9100	05-17-03	
	9101	05-17-03	
Ergo Sciences, Inc.	6297	05-18-03	\$5937.90
	6298	05-18-03	
	6300	05-18-03	
	6301	05-18-03	
	6302	05-18-03	
	6303	05-19-03	
C B Preferred Land Transfer LLC	20566	05-19-03	\$20,782.65
	20567	05-19-03	
	20568	05-19-03	
	20569	05-19-03	
	20570	05-20-03	
	20576	05-20-03	
	20577	05-21-03	
	20578	05-21-03	
	20579	05-21-03	
	20590	05-22-03	
	20591	05-22-03	
	20592	05-22-03	
	20594	05-22-03	
	20593	05-23-03	
	20595	05-23-03	
	20596	05-23-03	
	20597	05-23-03	
	20595	05-24-03	
	20597	05-24-03	
	20599	05-24-03	
	20596	05-25-03	
County of Chester	5103	05-25-03	\$989.65
Suburban Steel Erectors, Inc.	10383	05-25-03	\$1,979.30
	10387	05-25-03	

Absolute Mortgage Company Inc.	6211	05-26-03	\$1,979.30
	6212	05-26-03	
Blue Ribbon Group, Inc.	998	06-05-03	\$3,876.34
	1002	06-05-03	
	1003	06-05-03	
	1004	06-05-03	
	1005	06-05-03	
J.W. Lasala Inc.	1098	06-05-03	\$4,448.25
	1099	06-05-03	
	1100	06-06-03	
	1101	06-06-03	
	1105	06-06-03	
C.E.C. [an individual]	1052	06-14-03	\$2,509.50
	1053	06-14-03	
	1054	06-14-03	
Citizens Against Lawsuit Abuse, Inc.	1049	06-17-03	\$5,855.50
	1050	06-17-03	
	1051	06-17-03	
	1052	06-17-03	
	1054	06-18-03	
	1055	06-18-03	
	1057	06-18-03	
Brandywine Suites Hotel LLC	1258	06-18-03	\$1,673.00
	1260	06-18-03	
John H. Parks, Inc. TA Parsky's	1540	06-18-03	\$2,386.08
	1542	06-18-03	
	1543	06-18-03	
Fin-atics Supply, Ltd	7708	06-19-03	\$2,235.90
	7710	06-19-03	
	7709	06-20-03	
RPM Corporation	2618	06-19-03	\$836.50
Kreszl Ceramic Laboratory	19329	06-20-03	\$845.25
Siganos Realty, LLC	4546	06-20-03	\$2,509.50
	4547	06-20-03	
	4548	06-20-03	

Catering Xpress	12800 12801 12802 12804 12805	06-29-03 06-29-03 06-29-03 06-30-03 06-30-03	\$4,079.89
Mid Atlantic Pump & Equipment Co.	18949 18950 18951 18952 18953 18954 18955 18956 18957 18948	06-29-03 06-29-03 06-29-03 06-30-03 06-30-03 06-30-03 06-30-03 06-30-03 06-30-03 06-30-03	\$8,052.66
North American Marketing Tours Inc.	2805 2806	06-30-03 06-30-03	\$1,539.70
PLUS NJ Inc.	24279 28181 28182 28183	06-22-03 07-20-03 07-20-03 07-20-03	\$3,189.09
Infinite Options	1204 1205 1206 1207 1212 1213 1215 1216	07-20-03 07-20-03 07-20-03 07-20-03 07-21-03 07-21-03 07-22-03 07-23-03	\$6,644.26
Weaz-Radio, Inc.	67153	08-15-03	\$866.51
Myers Maintenance Co, LLC	5646 5647 5648 5649	10-17-03 10-17-03 10-17-03 10-17-03	\$3,558.76
Highgate Steel, Inc.	26478 26479 26480 26481	10-19-03 10-20-03 10-20-03 10-20-03	\$3,538.00
Manchester Manor Nursing Home	44416 44419	10-24-03 10-24-03	\$1,699.26

Data Processing Trainers BS School, Inc.	44416	10-24-03	\$7,445.15
	44419	10-24-03	
	5450	11-03-03	
	5455	11-03-03	
	5457	11-03-03	
	5451	11-05-03	
	5452	11-05-03	
	5453	11-05-03	
	5454	11-05-03	

All in violation of Title 18, United States Code, Sections 1344 and 2.

## **COUNT FIVE**

### **THE GRAND JURY FURTHER CHARGES THAT:**

1. At all times material to this indictment, Wachovia Bank and the former First Union National Bank (collectively, "Wachovia Bank") were financial institutions, the deposits of which were federally insured by the Federal Deposit Insurance Corporation.

2. From in or about March 2003, through in or about May 2003, in the Eastern District of Pennsylvania and elsewhere, defendants

**SHAWN GEATHERS, a/k/a "Malik Bey,"  
JAMES ROBINSON, a/k/a "Aaron White,"  
YARNELL FOWLER, and  
JARRETT STIFF, a/k/a "Chicago,"**

and others known and unknown to the grand jury, knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to defraud Wachovia Bank, and to obtain money owned by and under the custody and control of Wachovia Bank, by means of false and fraudulent pretenses, representations, and promises.

### **THE SCHEME**

It was part of the scheme that:

3. Paragraphs 3 through 7 of Count One are realleged here.

4. Defendants JAMES ROBINSON, a/k/a "Aaron White," YARNELL FOWLER, JARRETT STIFF, a/k/a "Chicago," and others known and unknown to the grand jury all acted as passers. As passers, they cashed and attempted to cash the counterfeit checks at Wachovia Bank.

5. The following counterfeit checks were cashed or attempted to be cashed

by passers at Wachovia Bank:

Payer information on counterfeit checks	Check numbers	Approximate dates	Total amount of counterfeit checks
SAI Marketing Incorporated	6649	03-03-03	\$1,453.04
	6650	03-03-03	
Atlantic County Inmate Funds	25178	03-14-03	\$875.00
Philadelphia Traffic Court	228756	04-04-03	\$3,595.00
	228757	04-04-03	
	228758	04-04-03	
	228759	04-04-03	
Community College of Philadelphia	341294	04-23-03	\$5,194.80
	341292	04-24-03	
	341293	04-24-03	
	341295	04-24-03	
	341298	04-24-03	
	341299	04-24-03	

All in violation of Title 18, United States Code, Sections 1344 and 2.

## **COUNT SIX**

### **THE GRAND JURY FURTHER CHARGES THAT:**

1. At all times material to this indictment, M&T Bank was a financial institution, the deposits of which were federally insured by the Federal Deposit Insurance Corporation.

2. In or about April 2003, in the Eastern District of Pennsylvania and elsewhere, defendants

**SHAWN GEATHERS, a/k/a “Malik Bey,”  
JAMES ROBINSON, a/k/a “Aaron White,” and  
MICHAEL A. DAUGHERTY, JR.**

knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to defraud M&T Bank, and to obtain money owned by and under the custody and control of M&T Bank, by means of false and fraudulent pretenses, representations, and promises.

### **THE SCHEME**

It was part of the scheme that:

3. Paragraphs 3 through 7 of Count One are realleged here.

4. Defendants JAMES ROBINSON, a/k/a “Aaron White,” and MICHAEL A. DAUGHERTY, JR. acted as passers. As passers, they cashed and attempted to cash the counterfeit checks at M&T Bank.



5. The following counterfeit checks were cashed or attempted to be cashed by passers at M&T Bank:

Payer information on counterfeit checks	Check numbers	Approximate dates	Total amount of counterfeit checks
V-Tech Services Inc.	40890	04-14-03	\$15,203.20
	40902	04-15-03	
	40882	04-16-03	
	40883	04-16-03	
	40884	04-16-03	
	40885	04-16-03	
	40889	04-16-03	
	40887	04-17-03	
	40888	04-17-03	
	40891	04-17-03	
	40892	04-17-03	
	40907	04-17-03	
	40908	04-17-03	

All in violation of Title 18, United States Code, Sections 1344 and 2.

## **COUNT SEVEN**

### **THE GRAND JURY FURTHER CHARGES THAT:**

1. At all times material to this indictment, Sovereign Bank was a financial institution, the deposits of which were federally insured by the Federal Deposit Insurance Corporation.
2. From in or about April 2003, through in or about June 2003, in the Eastern District of Pennsylvania and elsewhere, defendants

**SHAWN GEATHERS, a/k/a “Malik Bey,”  
JAMES ROBINSON, a/k/a “Aaron White,”  
YARNELL FOWLER,  
JARRETT STIFF, a/k/a “Chicago,”  
EBONY KELSEY, and  
JAMAL GRIFFIN**

knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to defraud Sovereign Bank, and to obtain money owned by and under the custody and control of Sovereign Bank, by means of false and fraudulent pretenses, representations, and promises.

### **THE SCHEME**

3. Paragraphs 3 through 7 of Count One are realleged here.
4. Defendants JAMES ROBINSON, a/k/a “Aaron White,” YARNELL FOWLER, JARRETT STIFF, a/k/a “Chicago,” EBONY KELSEY, and JAMAL GRIFFIN all acted as passers. As passers, they cashed and attempted to cash the counterfeit checks at Sovereign Bank.

5. The following counterfeit checks were cashed or attempted to be cashed by passers at Sovereign Bank:

Payer information on counterfeit checks	Check numbers	Approximate dates	Total amount of counterfeit checks
FineCare Inc.	6934	04-09-03	\$741.25
Diversified Health Assoc. Inc.	21403 32398 32398 32399 32400 32401 32402 32413 32414 32416	05-10-03 05-10-03 05-10-03 05-10-03 05-10-03 05-10-03 05-12-03 05-12-03 05-12-03 05-12-03	\$7,255.00
Metro Elevator Company, Inc.	9095 9097 9103 9106	05-17-03 05-17-03 05-17-03 05-17-03	\$3,958.60
Fred Beans Ford	11966 11957 11957	05-20-03 05-21-03 05-21-03	\$2,968.95
Halpern & Levy, P.C.	4889 4887 4890	06-25-03 06-26-03 06-26-03	\$2,695.55

All in violation of Title 18, United States Code, Sections 1344 and 2.

**NOTICE OF ADDITIONAL FACTORS**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. In committing the offenses charged in Counts One through Seven of this indictment, defendant **SHAWN GEATHERS, a/k/a “Malik Bey”**:

(a) Committed an offense and relevant conduct in which the loss exceeded \$400,000, as described in U.S.S.G. § 2B1.1(b)(1).

(b) Committed an offense and relevant conduct involving 10 or more victims, as described in U.S.S.G. § 2B1.1(b)(2)(A).

(c) Committed an offense in which he was an organizer and leader of a criminal activity that involved five or more participants and was otherwise extensive, as described in U.S.S.G. § 3B1.1(a).

2. In committing the offenses charged in Counts One through Seven of this indictment, defendant **JAMES ROBINSON, a/k/a “Aaron White”**:

(a) Committed an offense and relevant conduct in which the loss exceeded \$400,000, as described in U.S.S.G. § 2B1.1(b)(1).

(b) Committed an offense and relevant conduct involving 10 or more victims, as described in U.S.S.G. § 2B1.1(b)(2)(A).

(c) Committed an offense in which he was an organizer and leader of a criminal activity that involved five or more participants and was otherwise extensive, as described in U.S.S.G. § 3B1.1(a).

(d) Committed the offenses while under a criminal justice sentence, as defined by U.S.S.G. § 4A1.1(d).

3. In committing the offenses charged in Counts Three, Four, Five and Seven of this indictment, defendant **YARNELL FOWLER**:

(a) Committed an offense and relevant conduct in which the loss exceeded \$70,000, as described in U.S.S.G. § 2B1.1(b)(1).

(b) Committed an offense and relevant conduct involving 10 or more victims, as described in U.S.S.G. § 2B1.1(b)(2)(A).

(c) Committed an offense in which he was a manager and supervisor of a criminal activity that involved five or more participants and was otherwise extensive, as described in U.S.S.G. § 3B1.1(a).

4. In committing the offenses charged in Counts One and Four of this indictment, defendant **RANDOLPH WASHINGTON**:

(a) Committed an offense and relevant conduct in which the loss exceeded \$70,000, as described in U.S.S.G. § 2B1.1(b)(1).

(b) Committed an offense and relevant conduct involving 10 or more victims, as described in U.S.S.G. § 2B1.1(b)(2)(A).

(c) Committed the offenses while under a criminal justice sentence, as defined by U.S.S.G. § 4A1.1(d).

(d) Committed the instant offense less than two years after release from imprisonment on a sentence of imprisonment exceeding one year and one month, as defined by U.S.S.G. § 4A1.1 (a) and (e).

5. In committing the offenses charged in Counts Two, Three, Four and Seven of this indictment, defendant **EBONY KELSEY**:

(a) Committed an offense and relevant conduct in which the loss exceeded \$30,000, as described in U.S.S.G. § 2B1.1(b)(1).

6. In committing the offenses charged in Count One of this indictment, defendant **NORA SALTERS**:

(a) Committed an offense and relevant conduct in which the loss exceeded \$10,000, as described in U.S.S.G. § 2B1.1(b)(1).

7. In committing the offenses charged in Count Four of this indictment, defendant **PAUL WHITESIDE, a/k/a “Puma”**:

(a) Committed an offense and relevant conduct in which the loss exceeded \$10,000, as described in U.S.S.G. § 2B1.1(b)(1).

(b) Committed the offenses while under a criminal justice sentence, as defined by U.S.S.G. § 4A1.1(d).

8. In committing the offenses charged in Counts Three, Four, Five and Seven of this indictment, defendant **JARRETT STIFF, a/k/a “Chicago”**:

(a) Committed an offense and relevant conduct in which the loss exceeded \$70,000 as described in U.S.S.G. § 2B1.1(b)(1).

(b) Committed an offense and relevant conduct involving 10 or more victims, as described in U.S.S.G. § 2B1.1(b)(2)(A).

9. In committing the offenses charged in Counts Two, Four and Seven of this indictment, defendant **JAMAL GRIFFIN**:

(a) Committed an offense and relevant conduct in which the loss exceeded \$120,000, as described in U.S.S.G. § 2B1.1(b)(1).

(b) Committed an offense and relevant conduct involving 10 or more victims, as described in U.S.S.G. § 2B1.1(b)(2)(A).

10. In committing the offenses charged in Counts Three and Four of this indictment, defendant **SHARNITA JACKSON**:

(a) Committed an offense and relevant conduct in which the loss exceeded \$70,000, as described in U.S.S.G. § 2B1.1(b)(1).

(b) Committed an offense and relevant conduct involving 10 or more victims, as described in U.S.S.G. § 2B1.1(b)(2)(A).

11. In committing the offenses charged in Count Six of this indictment, defendant **MICHAEL A. DAUGHERTY, JR.**:

(a) Committed an offense and relevant conduct in which the loss exceeded \$70,000, as described in U.S.S.G. § 2B1.1(b)(1).

(b) Committed an offense and relevant conduct involving 10 or more victims, as described in U.S.S.G. § 2B1.1(b)(2)(A).

## NOTICE OF FORFEITURE

### THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1344 set forth in Counts One through Seven of this Indictment, the defendants

**SHAWN GEATHERS, a/k/a “Malik Bey,”  
JAMES ROBINSON, a/k/a “Aaron White,”  
YARNELL FOWLER,  
RANDOLPH WASHINGTON,  
EBONY KELSEY,  
NORA SALTERS,  
PAUL WHITESIDE, a/k/a “Puma,”  
JARRETT STIFF, a/k/a “Chicago,”  
JAMAL GRIFFIN,  
SHARNITA JACKSON, and  
MICHAEL A. DAUGHERTY, JR.**

shall forfeit to the United States of America any property that constitutes, or is derived from proceeds obtained directly or indirectly from the commission of such offenses, as charged in this indictment.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b),



incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2).

A TRUE BILL:

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FOREPERSON

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PATRICK L. MEEHAN  
United States Attorney